

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Case No. 5:22-cv-0068-BO

YOLANDA IRVING, et al,

Plaintiffs,

vs.

THE CITY OF RALEIGH, et al,

Defendants.

DECLARATION OF DAWN BLAGROVE

1. My name is Dawn Blagrove. I am an attorney and the Executive Director of Emancipate NC.
2. The mission and purpose of Emancipate NC is to end mass incarceration and structural racism in the legal system in North Carolina through community education, narrative shift, and litigation. The organization has a particular focus and does considerable work in the City of Raleigh.
3. Defendants' wrongful actions with respect to the execution of search warrants against Plaintiffs, as well as the fact that the warrant was associated with a case in which a dozen Black men were wrongfully arrested by a rogue police officer, has sewn significant distrust in the Raleigh community and has

perceptibly impaired Emancipate NC's mission of ending structural racism in the legal system.

4. One aspect of Emancipate NC's work is "rapid response." Community members call us to report incidents of police misconduct and to seek advice. We also receive calls and letters about incidents that occur inside a prison or jail and unfair charges and convictions.
5. We have six full-time staff members and a part-time paralegal. All of us respond to these types of inquiries. We endeavor to provide advice and counsel to people experiencing these issues, and their family members.
6. Sometimes, we elevate the issue using informal administrative advocacy, media attention, or litigation. Other times, we simply provide advice and empathy to the individual.
7. Inquiries about misconduct in Wake County are by far the greatest source of this aspect of our work, dating back to the 2018 Wake County Sheriff's Office beating of Kyron Hinton.
8. There are two staff members who spend a large portion of their time responding to Wake County-based inquiries: myself and Kerwin Pittman.
9. Kerwin Pittman and myself regularly appear in media outlets discussing the criminal legal system and for this reason, people know to come to us for help.
10. At this point, myself and Kerwin receive on average about 3 inquiries about Raleigh Police misconduct a week. Each of these require extensive time to call back witnesses, interview them, listen empathetically, provide advice,

and evaluate what response, if any, the organization will take, as a result, including debriefing other team members and making game plans.

11. These inquiries include complaints about No Knock execution of warrants and aggressive RPD home raids, as well as excessive use of force, officer-involved shootings, unfair arrests, and disrespectful conduct.

12. Emancipate NC has been forced to divert resources to attend to problems related to No Knock warrant executions by Raleigh Police as well as generalized poor training and supervision of Raleigh Police officers, who seldom face consequences for bad behavior with community members.

13. For instance, because of the high volume of complaints from Raleigh, including about warrants, we have not been able to do as much work in Pasquotank County as we hoped to be able to do in 2022. Additionally, we have had to hire a paid intern to help use with the volume of intake and do triage of Raleigh inquiries.

Pursuant to 28 U.S.C. § 1746, I declare under penalty that the foregoing is true and correct to the best of my knowledge.

Sign and sworn this 16th day of May, 2022

A handwritten signature in black ink, appearing to read 'Dawn Blagrove', written over a horizontal line.

Dawn Blagrove